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12
13 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 **In re:**

15 **PG&E CORPORATION**

16 **-and-**

17 **PACIFIC GAS AND ELECTRIC**
COMPANY,

18 **Debtors.**

19 Affects PG&E Corporation
20 Affects Pacific Gas and Electric Company
21 Affects both Debtors

22 *All papers shall be filed in the Lead Case,
23 No. 19-30088 (DM)

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ERIC GOODMAN
IN SUPPORT OF *EX PARTE* MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS PURSUANT TO
B.L.R. 9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON MOTION FOR ENTRY OF AN
ORDER (I) ESTABLISHING A BAR
DATE FOR FILING FIRE CLAIMS,
(II) APPROVING THE FORM AND
PROCEDURES FOR NOTICE OF THE
BAR DATE FOR FIRE CLAIMS, AND
(III) APPROVING SUPPLEMENTAL
PROCEDURES FOR NOTICE OF THE
BAR DATE TO FIRE CLAIMANTS**

24 Related Document: Dkt. No. 2297

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26
27 [No hearing requested]

I, Eric Goodman, do hereby declare under penalty of perjury as follows:

1. I am a partner at Baker & Hostetler LLP, attorneys for the Official Committee of Tort Claimants (the “TCC”) in the above-captioned chapter 11 cases.

2. I submit this declaration in support of the Motion of the TCC (the “Motion to Shorten”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Northern District of California, for entry of an order shortening time for a hearing on June 11, 2019, at 9:30 a.m. (the “**Omnibus Hearing**”), on the *Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§ 105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c), 5005 and 9007 for Entry of an Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form and Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving Supplemental Procedures for Notice of the Bar Date to Fire Claimants* (the “**TCC Motion**”) (Dkt. No. 2297). The TCC requests that written objections, if any, be due by 4:00 p.m. (Pacific Time) on June 10, 2019.

3. On May 29, 2019, I sent an e-mail to the Debtors' counsel inquiring as to whether the Debtors would consent to notice being shortened on the TCC Motion. On May 30, 2019, the Debtors' counsel informed me that the Debtors do not object to shortening time so that the TCC Motion is heard on June 11, 2019, at 9:30 a.m. (Pacific Time), subject to an objection deadline of June 10, 2019, at 4:00 p.m. (Pacific Time).

4. Ample cause exists to hear the TCC Motion on shortened time at the Omnibus Hearing on June 11, 2019, at 9:30 a.m. (Pacific Time). By granting the Motion to Shorten, the Court would be in a position on June 11, 2019 where it could not only grant the TCC's Claim Form Motion (Dkt. No. 1824) and adopt the TCC's model proof of claim form for Fire Claims, but also approve the bar date and notice plan proposed by the TCC. Further, to advance these Chapter 11 Cases, the TCC wants to implement its notice plan as soon as practicable.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Cleveland, Ohio, on May 31, 2019.

/s/ Eric Goodman
Eric Goodman